

# **Exhibit 4**

**From:** [Nina Perales](#)  
**To:** [Robins, Jeffrey \(CIV\)](#); [Disher, Todd](#)  
**Cc:** [Celina Moreno](#); [Alejandra Avila](#); [Ernest Herrera](#); [Rachel.Apter@njoag.gov](#); [Biggs, Adam](#)  
**Subject:** RE: Texas et al v. United States, No. 1:18-cv-0068-ASH (S.D. Tex.)  
**Date:** Saturday, June 09, 2018 7:58:08 PM

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Dear Mr. Robins,

Yes, I can definitely agree that Defendant Intervenors do not represent Mr. Neufeld. I can also clarify that Mr. Neufeld falls into the category of witnesses upon whose previous sworn statements we plan to rely.

In our discovery negotiations, Mr. Disher specifically asked us to identify all lay witnesses on whom we plan to rely -- witnesses who will prepare new declarations for our PI response brief and witnesses who have previous sworn testimony that we plan to attach to our PI response brief.

In an excess of caution, and in the interests of full disclosure and maintaining a positive relationship with opposing counsel, we disclosed Mr. Neufeld.

If Texas plans to depose Mr. Neufeld, we would of course expect Texas to work that out with you, and inform us of the arrangements for a deposition.

I hope this clarifies our intent. Please let me know if you have any additional questions,

Nina Perales  
Vice President of Litigation  
Mexican American Legal Defense  
and Educational Fund, Inc. (MALDEF)  
110 Broadway, Suite 300  
San Antonio, TX 78205  
Ph (210) 224-5476 ext. 206  
FAX (210) 224-5382

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**From:** Robins, Jeffrey (CIV) [mailto:Jeffrey.Robins@usdoj.gov]  
**Sent:** Saturday, June 09, 2018 7:49 PM  
**To:** Nina Perales; Disher, Todd  
**Cc:** Celina Moreno; Alejandra Avila; Ernest Herrera; Rachel.Apter@njoag.gov; Biggs, Adam  
**Subject:** RE: Texas et al v. United States, No. 1:18-cv-0068-ASH (S.D. Tex.)

Ms. Perales,

I plan to follow up with a further email regarding the propriety of identifying a federal government employee as a witness here, but just to be clear for the moment, do you agree that you do not represent Mr. Neufeld and should not be accepting service on his behalf?

Thanks,

Jeff

Sent from my Verizon Wireless 4G LTE smartphone

----- Original message -----

From: Nina Perales <nperales@MALDEF.org>  
Date: 6/9/2018 7:59 AM (GMT-05:00)  
To: "Disher, Todd" <Todd.Disher@oag.texas.gov>  
Cc: Celina Moreno <cmoreno@MALDEF.org>, Alejandra Avila <Aavila@MALDEF.org>, Ernest Herrera <eherrera@MALDEF.org>, "Robins, Jeffrey (CIV)" <jerobins@CIV.USDOJ.GOV>, Rachel.Apter@njoag.gov, "Biggs, Adam" <Adam.Biggs@oag.texas.gov>  
Subject: Re: Texas et al v. United States, No. 1:18-cv-0068-ASH (S.D. Tex.)

Good morning Todd,

Yes, MALDEF will accept service of deposition subpoenas on our witnesses' behalf. We will have dates for at least two more witnesses today.

Sent from my iPhone

> On Jun 8, 2018, at 7:41 PM, Disher, Todd <Todd.Disher@oag.texas.gov> wrote:  
>  
> Understood. Thank you for checking.  
>  
> Do you have dates and locations for the other five witnesses? For those witnesses who are not your clients, it appears that MALDEF will accept service of deposition subpoenas on their behalf due to the c/o designation. Please confirm.  
>  
> Thanks,  
>  
> Todd  
>  
> Todd Lawrence Disher  
> Special Counsel for Civil Litigation  
> Office of the Attorney General of Texas  
> P.O. Box 12548 (MC 001)  
> Austin, TX 78711-2548  
> (512) 936-2266  
> Todd.Disher@oag.texas.gov  
>  
> -----Original Message-----  
> From: Celina Moreno [<mailto:cmoreno@MALDEF.org>]  
> Sent: Friday, June 08, 2018 7:32 PM  
> To: Disher, Todd <Todd.Disher@oag.texas.gov>  
> Cc: Nina Perales <nperales@MALDEF.org>; Alejandra Avila <Aavila@MALDEF.org>; Ernest Herrera <eherrera@MALDEF.org>; Jeffrey.Robins@usdoj.gov; Rachel.Apter@njoag.gov; Biggs, Adam <Adam.Biggs@oag.texas.gov>  
> Subject: Re: Texas et al v. United States, No. 1:18-cv-0068-ASH (S.D. Tex.)

>  
> Unfortunately, no.  
>  
> Sent from my iPhone  
>  
>> On Jun 8, 2018, at 7:14 PM, Disher, Todd <Todd.Disher@oag.texas.gov> wrote:  
>>  
>> Thank you, Celina. Is Ms. Adossi available on June 16 as well?  
>>  
>> Todd Lawrence Disher  
>> Special Counsel for Civil Litigation  
>> Office of the Attorney General of Texas P.O. Box 12548 (MC 001)  
>> Austin, TX 78711-2548  
>> (512) 936-2266  
>> Todd.Disher@oag.texas.gov  
>>  
>> -----Original Message-----  
>> From: Celina Moreno [<mailto:cmoreno@MALDEF.org>]  
>> Sent: Friday, June 08, 2018 6:26 PM  
>> To: Disher, Todd <Todd.Disher@oag.texas.gov>  
>> Cc: Nina Perales <nperales@MALDEF.org>; Alejandra Avila  
>> <Aavila@MALDEF.org>; Celina Moreno <cmoreno@MALDEF.org>; Ernest  
>> Herrera <eherrera@MALDEF.org>; Jeffrey.Robins@usdoj.gov;  
>> Rachel.Apter@njoag.gov  
>> Subject: RE: Texas et al v. United States, No. 1:18-cv-0068-ASH (S.D.  
>> Tex.)  
>>  
>> Dear Todd,  
>> Attached, please find Defendant-Intervenors' list of lay witnesses. Also, our clients Karla Perez  
and Nancy Adossi are available to be deposed in Houston, Texas, on June 16 and June 21,  
respectively. Please confirm whether those dates work for you.  
>> Thanks,  
>> Celina  
>>  
>> Celina Moreno  
>> Interim Southwest Regional Counsel  
>> MALDEF  
>> 110 Broadway, Suite 300  
>> San Antonio, TX 78205  
>> ph (210) 224-5476, ext. 212  
>> fax (210) 224-5382  
>> [www.maldef.org](http://www.maldef.org)<[https://urldefense.proofpoint.com/v2/url?u=http-3A\\_\\_www](https://urldefense.proofpoint.com/v2/url?u=http-3A__www.maldef.org_d=DwIFAg&c=Z_mC1sqOcfBCM1ZptXokOj7_ss37GsaAMzCZyvOxKN4&r=sJXj47LoI4xQ4zRIYXYPjtSABNiF6feJS5WOFi3VXKU&m=sQYTAc5XJU_0SLDwIwFICzBX_c_dgTVsLb7CuBMuqbk&s=Y0eBu8Ked1Xu6SY-tC4smLv6U7BSbaNzCcdhT7fKENA&e=>)  
>> [maldef.org\\_d=DwIFAg&c=Z\\_mC1sqOcfBCM1ZptXokOj7\\_ss37GsaAMzCZyvOxKN4&r=](https://urldefense.proofpoint.com/v2/url?u=http-3A__www.maldef.org_d=DwIFAg&c=Z_mC1sqOcfBCM1ZptXokOj7_ss37GsaAMzCZyvOxKN4&r=sJXj47LoI4xQ4zRIYXYPjtSABNiF6feJS5WOFi3VXKU&m=sQYTAc5XJU_0SLDwIwFICzBX_c_dgTVsLb7CuBMuqbk&s=Y0eBu8Ked1Xu6SY-tC4smLv6U7BSbaNzCcdhT7fKENA&e=>)  
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>> [sJXj47LoI4xQ4zRIYXYPjtSABNiF6feJS5WOFi3VXKU&m=sQYTAc5XJU\\_0SLDwIwFICzBX](https://urldefense.proofpoint.com/v2/url?u=http-3A__www.maldef.org_d=DwIFAg&c=Z_mC1sqOcfBCM1ZptXokOj7_ss37GsaAMzCZyvOxKN4&r=sJXj47LoI4xQ4zRIYXYPjtSABNiF6feJS5WOFi3VXKU&m=sQYTAc5XJU_0SLDwIwFICzBX_c_dgTVsLb7CuBMuqbk&s=Y0eBu8Ked1Xu6SY-tC4smLv6U7BSbaNzCcdhT7fKENA&e=>)  
>> [\\_c\\_dgTVsLb7CuBMuqbk&s=Y0eBu8Ked1Xu6SY-tC4smLv6U7BSbaNzCcdhT7fKENA&e=>](https://urldefense.proofpoint.com/v2/url?u=http-3A__www.maldef.org_d=DwIFAg&c=Z_mC1sqOcfBCM1ZptXokOj7_ss37GsaAMzCZyvOxKN4&r=sJXj47LoI4xQ4zRIYXYPjtSABNiF6feJS5WOFi3VXKU&m=sQYTAc5XJU_0SLDwIwFICzBX_c_dgTVsLb7CuBMuqbk&s=Y0eBu8Ked1Xu6SY-tC4smLv6U7BSbaNzCcdhT7fKENA&e=>)  
>> [facebook.com/maldef](https://urldefense.proofpoint.com/v2/url?u=http-3A__www.maldef.org_d=DwIFAg&c=Z_mC1sqOcfBCM1ZptXokOj7_ss37GsaAMzCZyvOxKN4&r=sJXj47LoI4xQ4zRIYXYPjtSABNiF6feJS5WOFi3VXKU&m=sQYTAc5XJU_0SLDwIwFICzBX_c_dgTVsLb7CuBMuqbk&s=Y0eBu8Ked1Xu6SY-tC4smLv6U7BSbaNzCcdhT7fKENA&e=>)  
>> [twitter.com/maldef](https://urldefense.proofpoint.com/v2/url?u=http-3A__www.maldef.org_d=DwIFAg&c=Z_mC1sqOcfBCM1ZptXokOj7_ss37GsaAMzCZyvOxKN4&r=sJXj47LoI4xQ4zRIYXYPjtSABNiF6feJS5WOFi3VXKU&m=sQYTAc5XJU_0SLDwIwFICzBX_c_dgTVsLb7CuBMuqbk&s=Y0eBu8Ked1Xu6SY-tC4smLv6U7BSbaNzCcdhT7fKENA&e=>)  
>> The Latino Legal Voice for Civil Rights in America  
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